

CHAPTER 9: LEA MONITORING

9.1 Executive Summary

Program monitoring occurs throughout all levels of government, including federal, state, and local educational agencies. The intention of monitoring is to ascertain and analyze the degree of policy and program implementation. In your role as a state coordinator, you are responsible for monitoring LEAs to gauge the effectiveness and fidelity of EHCY program implementation in accordance with federal mandates.

While monitoring certainly focuses on federal and state statutory and regulatory compliance to ensure all partners are aware of and appropriately conducting their program responsibilities, LEA monitoring also provides an opportunity to deepen your understanding of local strategies to support students experiencing homelessness. The process can be collaborative—focused on deepening partnerships and finding opportunities for the greatest impact.

This chapter provides information and effective practices related to conducting McKinney-Vento compliance monitoring of LEAs. Specifically, we will outline:

- what the law requires for monitoring;
- how to select LEAs for monitoring;
- approaches to LEA monitoring;
- the LEA monitoring protocol;
- how to prepare to monitor LEAs; and
- how to prepare LEAs for monitoring.

9.2 McKinney-Vento Act Requirements

Monitoring LEA EHCY programs for compliance with the McKinney-Vento Act is a key responsibility for state coordinators. You must “provide technical assistance to and conduct monitoring of local educational agencies” (42 U.S.C. § 11432(f)(5)). This provision applies to LEAs both with and without

McKinney-Vento Act subgrants.

Effective practice recommended by the U.S. Department of Education suggests all LEAs should be monitored on a regular basis, with many states conducting on-site monitoring every three years and more frequently for LEAs with McKinney-Vento Act subgrants. However, monitoring may be conducted remotely through a document and data desk review, and interviews may be conducted remotely by telephone or audio-visual online applications.

Federal statute does not specify what SEA monitoring of LEAs must entail. However, to be effective, LEAs must be notified of the monitoring event. They must also be provided with the monitoring results and recommendations for program improvements. Federal non-regulatory guidance suggests a monitoring protocol include: a formal letter of notification; protocols for interviews, observations, and document review (as applicable); a written report of whether requirements were met or corrective actions are required; and a process for resolving corrective actions (non-regulatory guidance, Question E-9).

9.3 Selecting LEAs for Monitoring

The Department recommends SEAs prioritize monitoring LEAs at the greatest risk of non-compliance with the McKinney-Vento Act. A checklist for risk factors to consider may include:

- amount of time since the LEA was last monitored;
- number of findings in the previous monitoring;
- indications the LEA may be under-identifying homeless students;
- number of complaints received at the state level related to serving children and youth experiencing homelessness;
- quality of data submitted to the SEA and the Department;
- amount of turnover in the local liaison position;
- liaison participation in professional development offerings; and
- for subgrantees, submission of required records, end-of-year reports, and appropriate use of funds, including timely expenditures.

9.4 Approaches to LEA Monitoring

A state’s best approach to LEA monitoring depends on numerous contextual factors, such as the size of the state, time allotted for the position of state coordinator, and the state’s system of federal programs monitoring (e.g., separate monitoring for each program or consolidated monitoring).

The following approaches will help you weigh the advantages and disadvantages of different LEA monitoring methods. In addition to the time, effort, and resources you have available to expend on monitoring, you should also consider the relationships with local liaisons and the risk of LEA non-compliance. A more time-intensive approach to monitoring this year could yield more nuanced insight, deeper partnerships, and stronger LEA performance in years to come.

Approach	Description	Considerations
On-site Monitoring	On-site monitoring is considered the best way to enable a state coordinator to gain first-hand knowledge of an LEA EHCY program. While other approaches can offer some time-saving solutions that are economical and efficient, in some instances, there is no substitute for an on-site monitoring visit, particularly in LEAs where there is significant non-compliance.	High effort, high potential for impact. Though time-intensive, the SEA retains control and gains direct insight through observation.
Desk Monitoring	Desk monitoring entails a review of LEA data, documents, records, and needs assessment information to determine the level of compliance with the law. The state coordinator sends the local liaison a list of documents to provide to the SEA for review. Desk monitoring is usually combined with either an on-site or remote interview of LEA staff following the review of documents.	Efficient, data-driven. Lower effort yields limited insight without stakeholder feedback. LEA cooperation is needed. Follow-up often occurs.
Remote Monitoring	Remote monitoring through video conferencing enables a state coordinator to conduct interviews with a range of stakeholders. It is best utilized in combination with a review of data and documents before the meetings. State coordinators can alternate desk monitoring and on-site visits with an LEA or conduct remote reviews of only those LEAs with the least risk for non-compliance.	Targeted, stakeholder-driven. This approach offers efficiency but is best suited to LEAs with responsive and strong partners.
Consolidated Federal Monitoring	Some states combine their monitoring of federal programs into one consolidated monitoring process. Each program coordinator develops a set of questions related to their program and provides them to a team that visits each LEA. While spreading the monitoring across all federal program staff increases the breadth of the monitoring, there are two disadvantages to consider: (1) a federal program staff member may not be very familiar with the EHCY program, and (2) because consolidated monitoring includes several federal programs, the time allotted to the EHCY program may be minimal.	Risk of limited or less nuanced EHCY program insight. Consolidated monitoring provides a broad picture of LEA performance and efficiency for SEA partners, but less focus may be directed to the EHCY program.

Contract Monitoring	State coordinators may contract with external agencies or former local EHCY program staff to conduct LEA monitoring. Contractors must be very familiar with the EHCY program and well-trained in the monitoring process.	Mixed content knowledge poses risks. Trained third-party contractors and former staffers may lack recent context on EHCY initiatives and priorities.
Regional Monitoring	State coordinators convene a group of local liaisons to discuss compliance challenges and include individual interviews with each one. This regional monitoring approach can occur as a standalone activity or be scheduled in conjunction with regional trainings when the state coordinator is traveling to provide ongoing technical assistance.	Efficient approach with less individual attention for LEAs. This approach saves time and costs, but LEAs and liaisons receive less direct attention and support.

9.5 LEA Monitoring Protocol

Once you have selected your monitoring approach, you will need to revisit your LEA monitoring protocol. An effective LEA monitoring protocol should include a set of questions that capture program requirements and the LEA’s implementation of activities that meet those requirements. The questions should represent the law and guidance—while also probing to capture an accurate assessment of program implementation.

Key Resource

Many SEAs model their monitoring protocols based on ED’s priorities. You can access sample documents on the [monitoring page of the NCHE website](#).

State coordinators should ensure the following requirements in the McKinney-Vento Act are represented in the protocol: the State Plan (42 U.S.C. § 11432(g)(1)); LEA requirements (42 U.S.C. § 11432(g)(3)); coordination requirements (42 U.S.C. § 11432(g)(5)); and local liaison duties (42 U.S.C. § 11432(g)(6)). Since Title I, Part A is required to coordinate with local liaisons to determine the amount and use of the reserved funds, the monitoring protocol should also include questions related to this coordination to ensure the per pupil allocation of funds is sufficient to meet identified needs. The amount of set aside may be based on a needs assessment and should be determined in coordination with the local liaison. The SEA should ensure that all LEAs that have identified homeless children and youth and receive Title I, Part A funds have an EHCY set-aside, and that per pupil amounts do not vary widely throughout the state. For more information, consult the [NCHE Brief](#).

In recent years, the Department has encouraged EHCY programs to prioritize outreach and identification efforts on students experiencing homelessness from historically underserved populations, including students of color, English learners, LGBTQI+ students, and Native American students. The protocol should include questions that ask how LEAs are identifying the needs of historically underserved student populations and targeting services equitably.

The Department promotes the provision of wraparound services and contracting with community-based organizations to enable LEAs to expand the range of their services for students experiencing homelessness. The protocol should address both topics, especially during the period of funding availability of ARP-HCY. After this grant ends, it should be a focus of coordination and collaboration of LEAs and other local agencies and organizations serving children and youth experiencing homelessness. Additional questions for subgrantees should include those relating to fiscal management and carrying out specific program activities approved in their application for funding. Many LEA monitoring protocols are organized by sections that include the McKinney-Vento Act requirement, what the SEA will accept as evidence of implementation of the requirement, guiding questions, and space for monitors to record their responses.

9.6 Preparing to Monitor an LEA

As you prepare to monitor an LEA, you should also review data, documents, reports, and records to ensure you have an informed and clear view of the challenges and opportunities for implementing the EHCY program. Here are three steps you can take:

Monitoring Step	Detail
Review LEA data	Review EDPass and poverty data, then note LEAs that do not identify or under-identify students experiencing homelessness. <i>(See Chapter 12 on using data for program improvement.)</i>
Review LEA documents	Review LEA documents, reports, and records, including the following items commonly requested from LEAs scheduled for monitoring: <ul style="list-style-type: none"> • local liaison position description and time allotted to the position; • enrollment residency questionnaire; • LEA board policies related to the EHCY program, including the dispute policy; • agendas and participant logs for training related to children experiencing homelessness and the McKinney-Vento Act requirements; • phone and email logs for tracking barriers and complaints; • dispute records; • posters, brochures, flyers, resource lists that are given to identified families and youth, or links to webpages that include information for parents and youth experiencing homelessness; • Title I, Part A set-aside amount, including how the amount was determined and how the funds will be used; and • transportation records for children and youth experiencing homelessness to and from the school of origin.
Identify areas of concern or commendation	Identify areas of concern or commendation related to the McKinney-Vento Act for further investigation during a remote or site visit, which can be incorporated into the protocol.

9.7 Preparing LEAs for Monitoring

The best way to proactively prepare LEAs for monitoring is through your ongoing work to support LEAs and local liaisons with technical assistance, training, and guidance in implementing the EHCY program. In your relationship with LEA partners, you should be consistent in referring to EHCY mandates, non-regulatory guidance, and other foundational program documents. Returning to the legislation will create a mutual understanding of program expectations, roles, and requirements. In your role as a state coordinator, you should offer responsive technical assistance as compliance issues arise. Document these touchpoints as part of your ongoing support (outlined in Chapter 6).

Within the SEA, you can lead annual trainings focused on McKinney-Vento Act provisions and ways LEAs must comply with the law. Reminding your colleagues within the state office about the EHCY program requirements will also increase LEA compliance and coordination across programs. The SEA should make the LEA monitoring protocol available so LEAs know the requirements they must meet and the documents and records they must maintain for review when monitoring occurs.

The SEA must provide a letter of notification to the local liaison and the superintendent when they are selected for monitoring. The letter should include complete details on the type of monitoring, dates when the monitoring will occur, and what tasks the LEA must complete to prepare for monitoring, such as compiling documents for review or arranging interviews. Some SEAs provide a webinar to prepare LEAs who are selected for monitoring. State coordinators should reinforce that in addition to identifying compliance issues; monitoring provides opportunities for SEAs to identify technical assistance needs and support LEAs to become compliant with the law. Ensure your LEA partners understand how you will provide feedback after the monitoring event occurs. This feedback can take any form that summarizes findings and recommends corrective actions. You may choose to issue this feedback in a formal report or as informal communication between the SEA and LEA.



Additional Resources

- EHCY Non-Regulatory Guidance: [Section E-9](#)